

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

TYCO FIRE PRODUCTS LP,

*Plaintiff,*

v.

AIU INSURANCE COMPANY, *et al.*

*Defendants.*

Civil Action No. 2:23-cv-02384-RMG

Hon. Richard M. Gergel

**JOINT MOTION TO DISMISS CERTAIN ZURICH INSURERS**

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff Tyco Fire Products LP (“Tyco”), and Defendants American Guarantee and Liability Insurance Company, American Zurich Insurance Company, and Zurich American Insurance Company (“Certain Zurich Insurers”),<sup>1</sup> stipulate and jointly move for an unopposed order of dismissal as follows:

1. By letter dated December 19, 2023, Tyco and Certain Zurich Insurers gave notice that they had reached a settlement-in-principle of Tyco’s claims in this action. ECF 198.
2. Tyco and Certain Zurich Insurers have now finalized their settlement agreement.
3. Accordingly, Tyco and Certain Zurich Insurers jointly request that the Court enter an order dismissing Tyco’s claims against Certain Zurich Insurers with prejudice (with the exception of ZAIC in its capacity as successor-in-interest to certain underwriting companies, as set forth in Footnote 1), in the form substantially similar to the enclosed **Proposed Order**.
4. Tyco and Certain Zurich Insurers understand that no other party to this action opposes this motion.

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<sup>1</sup> The Certain Zurich Insurers do not include, and this motion does not apply to, Zurich American Insurance Company (“ZAIC”) in its capacity as successor-in-interest to certain underwriting companies, including but not limited to Zurich Insurance Company, U.S. Branch, which is responsible for Policy No. 89 35 351 and a certain other policy allegedly issued in 1979, in respect to which ZAIC is represented by separate counsel from Certain Zurich Insurers.

Dated: March 26, 2024

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